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8 *Attorneys for Defendant*
9 *Chunghsin Technology Group Co., Ltd. f/k/a*
10 *New Century Optronics Co., Ltd.*

11 **UNITED STATES DISTRICT COURT**
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

13 HDMI LICENSING ADMINISTRATOR, INC.,

14 Plaintiff,

15 v.

16 CHUNGHSIN TECHNOLOGY GROUP CO., LTD.
17 f/k/a NEW CENTURY OPTRONICS CO., LTD.

18 Defendant.

CASE NO.: 3:19-cv-00057-JST

**THIRD STIPULATION TO EXTEND TIME
TO RESPOND TO COMPLAINT [N.D.
CAL. L.R. 6-1(b) and 6-2];**

**DECLARATION OF ANDREW P.
VALENTINE;**

[~~PROPOSED~~] ORDER

Complaint Filed: January 4, 2019
Current Response Date: March 5, 2019
New Response Date: April 1, 2019

1 **JOINT STIPULATION**

2 Plaintiff HDMI Licensing Administrator, Inc. ("Plaintiff") and Defendant Chunghsin
3 Technology Group Co., Ltd. f/k/a New Century Optronics Co., Ltd. ("Defendant") enter into the
4 following stipulation, pursuant to Local Rules 6-1(b) and 6-2, extending Defendant's time to respond
5 to Plaintiff's Complaint (the "Complaint") and requesting a short extension to case management
6 deadlines:

7 WHEREAS, Plaintiff's Complaint was filed on January 4, 2019;

8 WHEREAS, Plaintiff contends Defendant was personally served with the Complaint on
9 January 8, 2019;

10 WHEREAS, the parties stipulated to an extension of Defendant's time to respond to the
11 Complaint from January 29, 2019 to February 19, 2019 (*Docket Entry No. 9*);

12 WHEREAS, the parties stipulated to an second extension of Defendant's time to respond to the
13 Complaint from February 19, 2019 to March 5, 2019 (*Docket Entry No. 10*);

14 WHEREAS, since the filing of the second stipulation, the parties have continued to engage in
15 discussions regarding settlement;

16 WHEREAS, as part of those discussions, Defendant has agreed not to contest service of
17 process of the Summons and Complaint;

18 WHEREAS, the parties have continued to engage in discussions regarding settlement and have
19 agreed to a third extension of time in accordance with Local Rule 6-1(a) until April 1, 2019 for
20 Defendant to respond to Plaintiff's Complaint;

21 WHEREAS, because the stipulated response date falls between currently existing case
22 management dates, the parties respectfully request that the case management deadlines be continued as
23 follows, pursuant to Local Rule 6-2:

24

Event	From (current)	To
LD conduct case management meet and confer per FRCP 26	March 27, 2019	April 24, 2019
LD parties submit Joint CMC Statement	April 10, 2019	May 8, 2019
Initial Case Management Conference	April 17, 2019 2:00 p.m.	May 15, 2019 2:00 pm

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2 WHEREAS, the stipulated extension will permit the parties to continue to confer about their
3 claims and defenses in this action and a potential resolution.

4 NOW, THEREFORE, IN CONSIDERATION OF THE FOREGOING:

5 1. IT IS HEREBY STIPULATED by and between the parties that, pursuant to Local Rule
6 6-1(a), Defendant shall have up to and including April 1, 2019 to respond to Plaintiff's Complaint.

7 2. IT IS FURTHER STIPULATED AND THE PARTIES JOINTLY REQUEST that the
8 current case management deadlines be continued as follows, pursuant to Local Rule 6-2:

Event	From (current)	To
LD conduct case management meet and confer per FRCP 26	March 27, 2019	April 24, 2019
LD parties submit Joint CMC Statement	April 10, 2019	May 8, 2019
Initial Case Management Conference	April 17, 2019 2:00 p.m.	May 15, 2019 2:00 pm

14 DATED: March 5, 2019

BESHADA FARNESE LLP

15 By: s/ Peter J. Farnese
16 Peter J. Farnese

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Pro Hac Vice Applications Forthcoming

24 *Attorneys for Plaintiff,*
25 *HDMI Licensing Administrator, Inc.*

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28 ///

1 DATED: March 5, 2019

DLA PIPER LLP (US)

2 By: s/ Andrew P. Valentine
Andrew P. Valentine

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7 *Attorneys for Defendant,*
8 *Chunghsin Technology Group Co., Ltd. f/k/a New Century*
9 *Optronics Co., Ltd.*

1 **DECLARATION OF ANDREW P. VALENTINE**

2 I, Andrew P. Valentine, declare as follows:

3 1. I am a partner at DLA Piper LLP (US) and represent Defendant Chunghsin Technology
4 Group Co., Ltd. f/k/a New Century Optronics Co., Ltd. in this matter.

5 2. The parties initially stipulated to an extension of Defendant's time to respond to the
6 Complaint from January 29, 2019 to February 19, 2019 (*Docket Entry No. 9*).

7 3. The parties subsequently agreed to a second extension extending Defendant's time to
8 respond to the Complaint from February 19, 2019 to March 5, 2019 (*Docket Entry No. 10*).

9 4. Since the filing of the second stipulation, the parties have continued to engage in
10 discussions regarding settlement.

11 5. As part of those discussions, Defendant has agreed not to contest service of process of
12 the Summons and Complaint.

13 6. To allow the parties to continue to engage in discussions regarding settlement, the
14 parties have agreed to a third extension of time, until April 1, 2019, for Defendant to respond to
15 Plaintiff's Complaint. The parties have also stipulated to the revise case management dates contained
16 herein.

17 7. The purpose of the parties' stipulations are to allow the parties to continue to engage in
18 discussions regarding settlement.

19 I declare under the penalty of perjury, under the laws of the United States of America that the
20 foregoing is true and correct and that this declaration was executed on this 5th day of March, 2019, at
21 East Palo Alto, California.

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23 

24 ANDREW P. VALENTINE

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: March 6, 2019



United States District Judge

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2 **ATTESTATION**

3 I, Andrew P. Valentine, am the ECF User whose identification and password are being used to
4 file the **THIRD STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT [N.D.**
5 **CAL. L.R. 6-1(a) AND 6-2]**. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that Jason
6 Drangel, counsel for Plaintiff HDMI Licensing Administrator, Inc., has concurred in this filing.

7
8 DATED: March 5, 2019

9 By: s/ Andrew P. Valentine
10 Andrew P. Valentine
11 DLA PIPER LLP (US)

12 *Attorneys for Defendant,*
13 *Chunghsin Technology Group Co., Ltd. f/k/a New*
14 *Century Optronics Co., Ltd.*